

UNITED STATES DISTRICT COURT
District of Massachusetts

Civil Action
No. 05-10078-DPW

PETER A. CRAWFORD, Plaintiff)
)
v.)
)
WOLVERINE, PROCTOR & SCHWARTZ, INC.,)
Steven F. Chilinski, Deepak S. Kulkarni,)
)
Defendants)

JOINT MOTION TO EXPAND PAGE LIMITS
FOR SUMMARY JUDGMENT MOTIONS

NOW COMES the Plaintiff and Defendants in the above-captioned action (collectively the “Parties”) and jointly move that this honorable Court, pursuant to Local Rule 7.1(b)(4) grant plaintiff, and defendants collectively, leave to file motions for Summary Judgment (due on March 17, 2006) of up to forty (40) pages. In support thereof, the Parties state that the issues are complex, that the amount in controversy is approximately \$1.7 million, and that neither party believes that the twenty page limit specified by Local Rule 7.1(b)(4) will be sufficient adequately to present, for the benefit of the Court, the facts and arguments underlying their motions.

Defendants further state that they will be moving for summary judgment on at least five of plaintiff’s discrete causes of action – and each particular cause of action will need to be addressed in separate legal arguments. Furthermore, at least one of

defendants' legal arguments involves a statutory interpretation question of first impression -- which will necessitate relatively detailed legal exposition.

Respectfully submitted,

PETER A. CRAWFORD,

WOLVERINE, PROCTOR & SCHWARTZ,
INC.; DEEPAK S. KULKARNI and STEVEN
CHILINSKI,

Plaintiff *Pro Se*

By their attorneys,

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Dated: March 9, 2006